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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GRETHUR
DIRECTOR

March 6, 2018

VIA E-MAIL AND U.S. MAIL

Ms. Cathy Stepp, Regional Administrator
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604-3507

Dear Ms. Stepp:

I wish to extend my thanks to you and your staff in the United States Environmental Protection Agency (USEPA), Region 5, for your continued support over the past several months in our agencies' coordinated efforts to address PFAS contamination in Michigan. As I expressed to the former Acting Regional Administrator, Bob Kaplan, we believe working together on these emerging contaminants is the best course of action.

In the interest of continuing interagency communication, I wanted to summarize some of the key points raised during our March 2, 2018, telephone call detailing the need to verify specific sampling results.

As you will recall, Wolverine World Wide, Inc. (Wolverine), is currently contracted with ALS-Kelso Laboratories for the analysis of PFAS constituents in residential drinking water samples at the House Street sampling area in north Kent County. ALS-Kelso Laboratories was suspended from the United States Department of Defense's Environmental Laboratory Accreditation Program on October 21, 2017, and was reinstated on February 8, 2018. Between October 21, 2017, and February 8, 2018, 1,038 drinking water samples were analyzed by ALS-Kelso Laboratories as part of the investigation of the extent of contamination. Of the 1,038 samples, the analytical results reported that:

- 679 samples were non-detect for PFOA/PFOS
- 288 samples were <70 parts per trillion (ppt) for PFOA/PFOS
- 71 samples were >70 ppt for PFOA/PFOS

Out of an abundance of caution, the Michigan Department of Environmental Quality (MDEQ) has agreed to take additional steps to validate PFAS sample results from ALS-Kelso Laboratories. In a previous conversation with USEPA Region 5 leadership, **the following proposal was presented by the USEPA for the State's consideration:**

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- Retest all non-detect residences for PFOA/PFOS (679 samples)
- Retest 25% of residences in the <70 ppt range for PFOA/PFOS (72 samples)
- Retest 25% of residences in the >70 ppt range for PFOA/PFOS (18 samples)

While this proposal presents a viable option for data validation, the costs and delayed time lines associated with this approach will hamper the speed and coverage of ongoing sampling efforts in the community. The total analytical costs of the 769 samples would amount to \$769,000 (at \$1,000 if expedited), and this proposal for resampling would take an estimated 3 months (1 for collection, 1 for analysis, and 1 for data validation). Although the MDEQ agrees that data validation, including some resampling, will be part of steps to validate past and future sample results in north Kent County, the approach outlined above would effectively halt the current progress of sampling and, thereby, cause unnecessary anxiety to local citizens.

As expressed in our call on March 2, the MDEQ would like to present an alternative proposal – taking current protections to public health, retesting, split sampling, monitoring wells, and the collected USEPA data into account:

Public Health:

- All residences sampled by Wolverine as part of the House Street and North Kent Disposal Locations have been provided bottled water at the time of sampling and continue to be on bottled water.
- All residences with concentrations above 70 ppt have been provided whole house filters by Wolverine.
- In the House Street and Wolven Study Areas, Wolverine has provided whole house filters to any residence with any detectable concentration of PFOA or PFOS.
- Since all homes where drinking water samples were analyzed in the past and are potentially part of these data validation efforts are currently on alternate water or treated water, there is time to evaluate the need for retesting.

Retesting:

- 509 of the 1,038 homes (49%) sampled by Wolverine using ALS-Kelso Laboratories during the period in question have already been resampled to test influent sampling for whole house filters. Wolverine is testing the installed whole house filters (influent and mid-stage) to ensure they are functioning properly (because whole house filters are not NSF-certified). Samples have been analyzed by a different laboratory (Eurofins-Lancaster).
- This includes all 359 samples that had ANY detectable levels of PFOA/PFOS.
- AECOM (MDEQ's PFAS consultant) is conducting a statistical analysis of the ALS-Kelso Laboratories vs. Eurofins-Lancaster data to determine any trends or statistical anomalies that may indicate any potential limitations of the ALS-Kelso Laboratories' data. Once this analysis is completed (expected the week of March 12, 2018), the MDEQ and USEPA can review the results to determine if any additional follow up is indicated for any or all of the categories of results (i.e., non-detect, <70 ppt, or >70 ppt).

Split Sampling:

- The MDEQ has conducted a preliminary review of data for split samples taken at three residential locations by Wolverine and the MDEQ in the northern Kent County area in December of 2017. The three split samples, selected to represent a wide range of concentrations, were each sent to three laboratories for analysis: ALS-Kelso, Eurofins-Lancaster, and Vista.
- The review (conducted by AECOM) found the test results from all three laboratories to be comparable.
- AECOM is currently conducting a Level 4 data validation of the reports from the three laboratories for all of these split samples. We expect to have the results of that validation the week of March 5, 2018.

Monitoring Wells:

- Vertical Aquifer Sampling (VAS) monitoring wells are already in place and more are in process.
- The data from the monitoring wells, strategically located, will provide for a scientific investigation and result in a solid characterization of the contaminant plumes.
- Data from residential wells is useful to measure exposures, but it is not as useful as measurements from groundwater in the environment to create a conceptual site model to analyze the contamination present and how/where it is moving.
- The data from monitoring wells will be used to compare to and examine the Wolverine results – again looking for any anomalies that may indicate any potential limitations or concerns with the ALS-Kelso data. Once this analysis is completed, the MDEQ and USEPA can review the results to determine if any additional follow up is indicated.

USEPA Data:

- The USEPA collected samples from 16 residences that had previously been sampled by Wolverine using ALS-Kelso Laboratories. Although these are not true split samples collected at the same time, the results from USEPA's analytical data appear to correlate well with the previously collected analytical data by Wolverine using ALS-Kelso Laboratories.

Due to these factors, the MDEQ proposes the following validation path within which the USEPA and MDEQ act jointly to:

- Evaluate the analysis of the 509 homes already resampled by Wolverine using a different laboratory (Eurofins-Lancaster);
- Evaluate the information provided by the VAS monitoring wells compared to data from the residential well testing; and
- Evaluate the outcome of the review of the Level 4 data validation for the three split samples.
- Then, together, the USEPA and MDEQ will make a decision as to the levels of follow-up sampling on specific residences based on the need to fill data gaps, gather additional information, or address any anomalies identified in the evaluations.

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The MDEQ appreciates the USEPA's partnership and cooperation in addressing PFAS contamination in Michigan and asks that the USEPA promptly identify any concerns with the proposed data validation measures for PFAS samples at Michigan sites.

Thank you for continuing to work collaboratively with the State of Michigan and MDEQ. We appreciate your support and assistance. As always, if you have any questions regarding either the status of our activities or the above areas of assistance, please give me a call.

Sincerely,



C. Heidi Grether
Director
517-284-6712

cc: Mr. Ed Chu, USEPA, Region 5
Ms. Carol Isaacs, Governor's Office
Mr. Mike Zimmer, Governor's Office
Ms. Polly Synk, Michigan Department of Attorney General
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Mr. Nate Zimmer, MDEQ